Georgia Dept of Early Care and Learning
BRIGHT FROM THE START

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Brian P. Kemp
Governor

Amy M. Jacobs
Commissioner

DECAL: Nutrition Services Division
FAQs: Serving meals to children during unanticipated school closures.

The purpose of this communication is to provide guidance on serving meals to children during unanticipated school closures.

CHILD AND ADULT CARE FOOD PROGRAM

Is there a start date for the recently approved CACFP waivers for non-congregate feeding, activity requirements for at-risk afterschool, and the mealtimes waiver?
These waivers are effective immediately through June 30 or until the federal declaration of a disaster, whichever comes first. These waivers are posted on the DECAL website at:
http://www.decal.ga.gov/documents/attachments/CACFPNationwideWaiversDuetoCOVID-19_03232020.pdf.

Center A is a non-CACFP site and is closing temporarily due to low numbers. The children from Center A are going to Center B, which is a CACFP site. This is a temporary center that is under review until we get through this health crisis.
   a. **Do the children in Center A (non-CACAP site and is closing) need to enroll at Center B and do they need to fill out income eligibility forms?** If this is a traditional CACFP site, not at-risk afterschool, then the answer is yes. Those children from Center A would have to enroll in Center B and they must be present for the meal. Proof of enrollment for the children coming from Center A to B would be required. If the facility is using income eligibility forms as proof as enrollment, they would be required. If the center is using another type of document as an enrollment form, then an income eligibility statement would not be required. However, all meals served to those children that don't have an income eligibility statement would be reimbursed at the paid rate, which is a lower rate.
   b. **If the combined enrollment disqualifies center B, can the two centers "live" together but document meals separately for center B to continue to claim for their children?** No, two sites cannot operate at the same location. Please contact your application specialist for additional guidance.

How can I operate a feeding site that complies with the Governor and local executive orders regarding social distancing?
Below are suggestions that may comply with the Governor's executive order that requires any gathering of more than 10 individuals to ensure six feet of distance is always maintained. However, sponsors and sites should ensure they review and comply with any local orders that may be in place. As private businesses, you are solely responsible for interpreting all orders to ensure you are able to operate and

not in violation of any jurisdiction's requirements. DECAL offers some guidance below; however, the DECAL's interpretations are the department's alone and shall not be used as the only criteria to determine whether to maintain operations or to cease operations.

- Have the children walk up to the food counter one at a time
- Utilize the non-congregate waiver and let the children pick up a meal and take it home
- Allow the children and their parent/guardians to enter the building and pick up meals in groups of 10 or less
- Limit number of staff working in the kitchen together
- Clean surfaces that are frequently touched including shared countertops, kitchen areas and doorknobs.

How can I serve children in community who are school aged and are NOT enrolled in my center? If so, do I obtain an Income Form?
As a CACFP provider/institution, you can serve school age children during school closures, but you will need proof of enrollment for that child in order to claim them. Income eligibility forms are available on our website under CACFP forms.

Can CACFP facilities provide non-congregate meals during this public health emergency?
Yes. As of March 20, the USDA approved a nationwide waiver to allow non-congregate feeding in CACFP and SFSP. The USDA recognizes that waiving the congregate meal requirement is vital to ensure appropriate safety measures for the purpose of providing meals and meal supplements. The waiver is effective immediately and remains in effect through June 30, 2020, or until the end of the federally declared public health emergency, whichever is earlier. DECAL will later provide additional guidance on implementing this non-congregate feeding waiver.

Are there any mealtime restrictions specific to CACFP during the public health emergency?
No. As of March 20, the USDA approved a nationwide waiver to allow flexibility in meal service time requirements to support streamlined access to nutritious meals.

Will CACFP training sessions still be offered during this time?
Web-based training sessions housed in GA ATLAS are still available. All CACFP sessions conducted via webinar will still be offered, i.e., Memo Monday. To view past Memo Monday sessions, visit our webpage. At this time, all face-to-face CACFP sessions have been temporarily postponed. Notification emails regarding these trainings were sent to those registered. Our office will correspond via email when the training sessions are rescheduled.

Should CACFP facilities that use pricing programs still charge families a meal fee if the facility is closed? What if a child is absent?
Meal fees for children enrolled in a CACFP participating facility should not be charged if the facility is closed due to the coronavirus outbreak. However, if the facility is open but the individual child is absent, the facility's existing meal policies should be followed.

For additional information, contact Kate Alexander, Policy Administrator, at Kate.Alexander@decal.ga.gov.

I am a CACFP sponsor. Do I have to adhere to monitoring requirements during unanticipated school closures?

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At this time, USDA has not communicated any flexibility regarding monitoring requirements. DECAL will notify sponsors immediately if additional information is received.

Do you recommend closing my child care center or day care home to prevent the spread of Coronavirus?
Considering the Governor's Executive Order, DECAL is providing the following guidance regarding the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP):

<u>Child Care Learning Centers</u>: Georgia's licensed Child Care Learning Centers (CCLC) may remain open if classrooms are limited to 10 or less individuals (including staff), and classrooms are self-contained. Current ratios for infants (1:6) and toddlers (1:8) must be maintained. DECAL is asking child care providers to update their open/close status on KOALA.

<u>Family Child Care Learning Homes</u>: Georgia's licensed Family Child Care Learning Homes (FCCLH) may also continue to operate. FCCLHs are permitted to serve up to 6 children for pay. To comply with the Governor's Executive Order, FCCLHs must ensure that their program does not have, at any time, groups of more than 10. This includes staff, family members, and children enrolled in the program.

<u>**Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP) Institutions and Sites Operating During the COVID-19 Public Health Emergency**</u>: DECAL is pleased that so many organizations have received permission to serve families impacted by COVID-19 closures through the SFSP and that so many institutions and facilities continue to serve families through the CACFP. These feeding programs can continue to operate if they follow the guidelines noted in the Governor's Executive Order.

If you do decide to close your center/day care home, notify your application specialist or email Leslie Truman at Leslie.Truman@decal.ga.gov

If a statewide mandate was issued requiring child care centers and homes to close, would the USDA provide financial relief or advancement to relieve the impact to sponsors?
At this time, DECAL is not aware of any plans for USDA to provide funding during times in which child care centers or homes are closed and not serving meals to children. If we receive additional information from USDA, we will provide this information to all institutions.

Are there any plans to postpone or reschedule the National CACFP Childcare Conference in April?
The Conference Committee has determined that the best course of action for everyone in our community at this time is to CANCEL the National Child Nutrition Conference entirely. Full refunds to attendees, exhibitors, advertisers and sponsors will be issued. Continued patience is requested as these refunds are processed in the next 90 days.

<u>**AT-RISK AFTERSCHOOL**</u>

Are educational or enrichment programs required for At-Risk Afterschool programs during the public health emergency?

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No. As of March 20, the USDA approved a nationwide waiver that does not require enrichment or educational activities during At-Risk After School programs. The waiver is effective immediately and remains in effect through June 30, 2020, or upon expiration of the federally declared public health emergency, whichever is earlier.

Are At-Risk Afterschool centers allowed to continue serving meals and snacks during unanticipated school closures?
Yes. At-Risk afterschool centers may continue serving meals and snacks as part of the At-Risk Afterschool Meals component of CACFP. When operating during unanticipated school closures, afterschool centers must continue to meet At-Risk Afterschool requirements. On days when schools are closed, at-risk afterschool centers that normally offer a snack and supper after school may instead choose to offer either lunch and a snack, or breakfast and a snack. These meals and snacks would be reimbursed through CACFP at the free rate. Additionally, CACFP sponsors may serve a snack and/or a meal at a site that has been served meals earlier in the day by SFSP sponsors.

Can I claim reimbursement for meals served to children who did not typically attend my At-Risk afterschool program (e.g., siblings of enrolled children whose schools are closed due to coronavirus concerns)?
Yes, if the child is eligible to receive meals and all required records are maintained which include but are not limited to meal count records, attendance records, and menus. See CACFP Policy 18 at http://www.decal.ga.gov/documents/attachments/CACFPPolicy18.pdf for recordkeeping requirements. Additionally, institutions should ensure the ATLAS application reflects current operations including the current average daily attendance and the types of meals served.

SUMMER FOOD SERVICE PROGRAM (SFSP)

Can schools that have been approved for non-congregate feeding through SFSP or SSO deliver meals directly to students' homes?
If a School Food Authority (SFA) determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with state agency approval, adherence to all federal confidentiality requirements, and with all necessary federal waiver approvals (including an approval for non-congregate feeding). Delivery could be accomplished by mail or delivery service, or hand delivered by school staff, volunteers, community organizations, or others. **This option is available to SFA sponsors of school sites only** due to student confidentiality and logistical requirements. Non-SFA sponsors are encouraged to work with local SFAs where possible.

Can we provide hot supper meals at mobile sites? They would be set up so that children come through a line and pick up a to-go-plate meal.
Summer Food sponsors have the option of providing hot supper meals at mobile sites to-go containers. CACFP providers/institutions now have the option of offering congregate feeding so you also provide meals in a "take out" container through a mobile site or supper. You want to make sure your application always reflects your current operations.

How does the SFSP work during an unanticipated school closure?
In the event of an unanticipated school closure, SFSP sponsors may serve FREE nutritious meals to children in low-income areas. Program requirements are the same as traditional SFSP but occur during the school year when unanticipated school closures occur.

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Am I eligible to serve SFSP meals during unanticipated school closures?
Sponsors who have participated in the SFSP within the past two years are eligible to serve meals during unanticipated school closures.

Am I required to submit an application to serve meals during an unanticipated school closure?
SFSP organizations are exempt from submitting new applications to participate if the sponsor participated in the SFSP during the current year or in either of the prior two fiscal years. In addition, new sponsors applying for participation in the program due to an unanticipated school closure are exempt from the application submission deadline. At a minimum, DECAL would still require the following documentation to be considered eligible for reimbursable meals during an unanticipated school closure:
- Site application identifying locations
- Food permit, if applicable (refer to the following link to determine if a food permit is required for the site. Click here to access food permit.
- Budget outline of projected expenses with supporting documentation. Click here to access a budget template. This template should only be used during unanticipated school closures.

What sites are eligible to serve SFSP meals during unanticipated school closures?
SFSP sites must still meet area eligibility requirements which means the site is in an area in which at least 50% of the children residing in the area are eligible for free or reduced-priced meals.

Can I serve meals at a new site?
Yes, sponsors may add new sites to serve meals during an unanticipated school closure if the site(s) meet the eligibility requirements noted above.

What are the options for SFSP meal service during unanticipated school closures?
- Breakfast only
- Snack only
- Lunch only
- Supper only
- Lunch and AM or PM Snack
- Breakfast and AM or PM Snack
- Breakfast and Lunch
- Supper and AM or PM Snack
- Breakfast and Supper
- AM and PM Snack

What is the meal pattern for SFSP during unanticipated school closures?
The meal pattern is the same as traditional SFSP. See https://www.fns.usda.gov/sfsp/meal-patterns

Can we provide a SFSP sack meal for a child to take home and qualify for reimbursement?
Yes, based on the declaration of a public health emergency due to the novel coronavirus by the U.S. Department of Health and Human Services, FNS has approved DECAL's request to waive the requirement that, during unanticipated school closures, SFSP meals must be served in a congregate setting. Public notice of the approved waiver can be accessed at: http://decal.ga.gov/documents/attachments/PublicAnnouncement_PublicHealthEmergencyWaiverRequest.pdf

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Are there plans to submit a waiver to allow sponsoring organizations to serve two meals and a snack during unanticipated school closures?
DECAL submitted a waiver to the USDA on March 18, 2020. The waiver would enable SFSP sponsors of open, restricted open, and enrolled sites who are in good standing, and within DECAL discretion, to serve up to two meals and a snack each day. This waiver requests that sponsors have the option to serve a lunch and supper as the two eligible meals to claim. Specifically, DECAL requests the following program regulation be waived: · 7 CFR 225.16(b)(3)(ii)

A copy of the official request can be found here:
http://decal.ga.gov/Nutrition/SFSPWaiverRequests.aspx

Has DECAL submitted other waiver requests to USDA FNS for the SFSP?
DECAL issued three (3) additional waiver requests to the USDA FNS Southeast Regional Office (SERO) for the SFSP. In the waivers, DECAL requested continued use of the following:
(1)   Area Eligibility in Closed Enrolled Sites (7 CFR 225.15(f)) *
(2)   Meal Service Times (7 CFR 225.16(c)) **(Approved by USDA)**
(3)   First Week Site Visits (7 CFR 225.15(d)(2)) **(Approved by USDA)**
*DECAL is awaiting approval for the remaining request and will notify SFSP sponsors once additional information is received. State policy guidance is currently being revised to reflect all approved waiver requests.

Copies of the waiver requests and public announcements can be found on DECAL's website at: http://decal.ga.gov/Nutrition/SFSPWaiverRequests.aspx. DECAL strongly advises organizations to regularly check the DECAL website for waiver updates.

How can families find the meal sites located in their area or community?
DECAL is getting the word out about where families can find meals for kids during school closures. We're collecting updates from our sponsoring organizations across the state and posting them here. Share the link with your friends to help spread the news that there are opportunities around Georgia for kids to get a healthy meal. Check back often for updates.

Will SFSP training sessions still be offered during this time?
Web-based training sessions housed in GA ATLAS are still available. All SFSP sessions conducted via webinar will still be offered, i.e., Memo Monday, Procurement Readiness, Budget Readiness, SFSP, and Recordkeeping 101. To view past Memo Monday sessions, visit our webpage. For those already registered for upcoming SFSP New Sponsor Orientation training sessions, training will be delivered **virtually (webinar)** and **web-based (self-study)**. More information is forthcoming.

CHILD AND ADULT CARE FOOD PROGRAM & SUMMER FOOD SERVICE PROGRAM

Some food items are difficult to locate right now. Will we be penalized if we can't serve a component for a meal due the current situation?
While the USDA expects and strongly encourages Program operators to maintain and meet the nutrition standards for each Program to the greatest extent possible during this public health emergency, a waiver was recently announced to allow meal pattern flexibility in the Child Nutrition Programs. However, to participate in this waiver, sponsors and institutions must contact DECAL for approval and requests will be approved on a case-by-case basis. Guidance will be distributed very soon

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What is an example of a non-congregate setting?
There are different variations. We've seen some facilities provide meals that are packaged in a to-go box at their existing site that has already been approved. It's a complete unitized meal that the child picks up and takes home. This is also appropriate when serving meals to adults. Another option would be to provide meals at the door so that no one enters the facility.

Is there a list of approved vendors able to provide meals and/or individual food items during the emergency? DECAL Nutrition Services currently does not have an "approved" list of vendors. However, below you will find a link to vendors and supplier currently serving our program providers.
http://decal.ga.gov/documents/attachments/CACFP_SFSP_WebVendorList.pdf

Will claims be processed as usual or will they be delayed?
We don't anticipate any delays in claims processing. Continue to adhere to the claim's submission requirements, and you will be paid according to the regular schedule.

Can you open ATLAS so we can process for March and get reimbursed quicker?
Unfortunately, no. March claims may be filed on April 1 to allow institutions and sites to claim for the entire month.

How do I add sites to my SFSP or CACFP application? Do we fax Add a Site packages to the DECAL Nutrition office?
Submit your emergency feeding sites to your business operations representative. Approving additional sites is a priority, so our Nutrition staff will process sites as quickly as possible. There are several options to submit information. You may email your application specialist with an add a site package or checklist or upload it to ATLAS and alert your business ops specialist by sending them your confirmation email.

Do we have authorization to pay food service staff double time, such as cooks, when they come in to prepare meals?
We have not received specific guidance from the USDA on this topic, however, any CACFP institution should adhere to its approved budgeted amounts.

Is it allowable to freeze milk and use it after the expiration date?
Although unopened milk is safely stored in the freezer at 0ºF for up to three months, freezing milk is not recommended. Freezing milk, specifically high fat milk (whole milk), causes changes that will deteriorate the texture, preventing it from being used as fluid milk. Additionally, the CACFP Crediting Handbook provides guidance that foods past the expiration date are not creditable. Therefore, if the milk expires, the milk will need to be discarded even if it has been frozen.

We are experiencing a milk shortage. Are there any flexibilities granted for the quantity and type of milk we can provide to children in our care?
Yes, DECAL can approve meals without milk, but we need a brief written notification explaining the interruption of milk service. An official request via email should include a list of site locations/addresses

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experiencing a shortage of milk and the date the shortage began. Forward your request to your Application Specialist and copy Sonja Adams at Sonja.adams@decal.ga.gov

If we are experiencing a milk shortage, what beverage alternative can we serve?
When experiencing a shortage of cow's milk, non-dairy alternatives may be used. However, alternatives must be nutritionally equivalent to cow's milk. Requiring non-dairy alternatives to be nutritionally equivalent to cow's milk ensures children receive vital nutrients needed for growth and development. Alternatives served to children ages 1-5 must be unflavored due to the higher sugar content of flavored varieties.

<u>Acceptable</u> non-dairy or cow's milk alternatives include:
- Low-fat or fat-free lactose-reduced, buttermilk and acidified milk
- Goat milk, sheep milk, buffalo milk (must be pasteurized)
- Soy milk (calcium and vitamin D fortified)

<u>Unacceptable</u> non-dairy or cow's milk alternatives include:
(These are examples and do not represent a comprehensive list.)
- Juice
- Almond milk
- Rice milk
- Almond milk "plus"
- Cashew milk
- Coconut milk
- Water
- Hemp milk
- Oat milk
- Whole grain drink
- Flax milk
- Calcium-fortified orange juice

Yogurt may not be substituted for fluid milk for children of any age. This is because milk provides a wealth of nutrients growing children need, such as vitamin A and D, and comparable quantities of these nutrients are not currently found in commercially available yogurts.

If cow's milk and acceptable non-dairy alternatives on the above acceptable list are served, no special approvals or waivers are required. However, if cow's milk or acceptable non-dairy alternatives are not available, and you are a CACFP or SFSP participant, you may contact DECAL to discuss a waiver of the milk requirement. Approvals would be based on a reasonable and justified need (e.g., public health emergency).

What resources or policy guidance is available relating to unanticipated school closures and/or the Coronavirus?
To date, the following guidance was posted to the DECAL website:
- Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks, March 13, 2020
- Meal Service during Unanticipated School Closures, March 13, 2020
- Centers for Disease Control and Prevention
    - http://www.cdc.gov/flu/freeresources/index.htm
    - https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/children-faq.html

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- o https://www.cdc.gov/coronavirus/2019-ncov/downloads/2019-ncov-factsheet.pdf
- Georgia Department of Public Health
  - o http://dph.georgia.gov/influenza-what-you-need-know
  - o https://dph.georgia.gov/coronavirus-disease-2019-covid-19-outbreak

Governor Kemp has ordered many state employees to work from home to prevent the spread of the Coronavirus. Does DECAL plan to close their offices? If so, what is the best way to submit CACFP and/or SFSP documents to the team?
Currently, DECAL does not plan to close our offices although many DECAL employees are teleworking to ensure greater social distancing. Regardless, DECAL including the Nutrition Services division is conducting business as usual.

The Nutrition Division asks all institutions to submit CACFP and/or SFSP documents electronically via email or uploaded in GA ATLAS. If information is uploaded in GA ATLAS, notify your assigned Application Specialist or Business Operations Representative.

For CACFP/SFSP Applications, contact:
Institutions 0 (zero) - G
Paula Lawrence, Application Specialist
404-463-2111
Paula.lawrence@decal.ga.gov
Institutions H-P
Sherika Blount, Application Specialist
404-656-6411
Shericka.blount@decal.ga.gov

Institutions Q-Z
Brandi Banks, Application Specialist
470-725-6543
Brandi.banks@decal.ga.gov

For CACFP/SFSP Add-a-Site Packages or Sponsor Updates, contact:
Institutions 0 (zero) - G
Temika Moore, Business Operations Representative
404-463-1494
Temika.moore@decal.ga.gov

Institutions H-P
Kenya Taylor, Business Operations Representative
404-463-4040
Kenya.taylor@decal.ga.gov

Institutions Q-Z
Edith Pierre, Business Operations Representative
404-463-8314
Edith.pierre@decal.ga.gov

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Are sponsors and institutions required to follow proper procurement procedures during an emergency?

Emergency purchases are defined as situations when the welfare of life, property, or the continuation of vital programs are in jeopardy and require immediate, on-the-spot purchases. Emergency purchases can be issued when there is limited time to purchase in the regular manner since the item or service is needed immediately. During an emergency, purchase, micro-purchase, and small purchase procedures are acceptable. Sponsors and institutions must have a process in place to document written quotes received via telephone and keep invoices and receipts on file. Contact DECAL if emergency purchases exceed formal procurement threshold limits.

See http://decal.ga.gov/documents/attachments/ProcurementManual.pdf

Am I able to donate leftover perishable food items to my children in the wake of unanticipated school closings?

Currently, DECAL is not aware of any flexibility allowing excess food (specifically perishable food items) purchased for the CACFP or SFSP to be donated to program participants in the wake of unforeseen circumstances such as Coronavirus.

Because of unforeseen circumstances, occasionally there will be leftover food. All alternatives permitted by program regulations and state and local health and sanitation codes should be exhausted before discarding food. Options may include using leftovers in subsequent meal services, offering "sharing tables," or transferring food to other sites. (See attached: Donation of Leftover Foods from School Cafeterias, June 11, 1996). Where it is not feasible to reuse leftovers, excess food may be donated to a non-profit organization, such as a community food bank, homeless shelter, or other nonprofit charitable organizations. See:

https://fns-prod.azureedge.net/sites/default/files/cn/SP11_CACFP05_SFSP07-2012os.pdf

What is necessary to amend budgets to get approval for disinfectants, etc. when these products become more readily available?

Due to the current situation, cleaning supplies such as disinfectants would be considered necessary and reasonable costs. If an institution would like to charge these costs, the ATLAS Budget Detail (Non-food supplies budget category) must be revised if any of the following factors apply:

- A new cost is incurred that wasn't previously approved in the budget
- A line item increases or decreases by 20% or more. A line item is defined as the function level, Operating and Administrative and/or the Program level CACFP and SFSP. If a change impacts either level by 20% or more, a budget revision is required.
- When allocation methodologies change due to changes within the organization resulting in an increase or decrease of 20% or more.
- A new cost item will be incurred that requires prior or specific prior approval or special consideration (i.e., formal procurement)
- When an approved specific prior written approval item's actual cost is found to be more than the actual approved amount
- Costs that exceed established maximums are unallowable, and the 20% rule does not apply when established maximums are breached.

Once the budget revision is completed, notify the Budget Compliance Specialist at Tremachel.Johnson@decal.ga.gov

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Nondiscrimination Statement: English Spanish